# IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In re:

: Case No.: 16-17120

Keith Kratzke : Chapter 13

Janet Kratzke : Judge Eric L. Frank

\* \* \* \* \* \* \* \* \* \* \* \* \* \* \* \* \* \* \*

Debtor(s)

:

Wilmington Trust, National Association, : Date and Time of Hearing

not in its individual capacity, but solely : Place of Hearing

as trustee for MFRA Trust 2014-2 : January 8, 2019 at 9:30 a.m.

Movant, :

: U.S. Bankruptcy Court

: 900 Market Street, Courtroom #1

Keith Kratzke : Philadelphia, PA, 19107

Janet Kratzke :

William C. Miller

Respondents.

## NOTICE OF MOTION, RESPONSE DEADLINE, AND HEARING DATE

Wilmington Trust, National Association, not in its individual capacity, but solely as trustee for MFRA Trust 2014-2 has filed a Motion for Relief from Automatic Stay.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney you may wish to consult an attorney.)

- 1. If you do not want the Court to grant the relief sought in the motion or if you want the Court to consider your views on the motion, then on or before January 1, 2019, you or your attorney must do **ALL** of the following:
  - A. File an answer explaining your position at:

### Clerk, U.S. Bankruptcy Court

U.S. Bankruptcy Court 900 Market Street Philadelphia, PA, 19107

If you mail your answer to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated above, and

B. Mail a copy to the Creditor's attorney and the below listed:

United States Trustee Office of the U.S. Trustee 833 Chestnut Street, Suite 500 Philadelphia, PA 19107

William C. Miller P.O. Box 1229 Philadelphia, PA 19105 ecfemails@ph13trustee.com

Manley Deas Kochalski LLC P.O. Box 165028 Columbus, OH 43216-5028

- 2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above, and attend the hearing, the Court may enter an Order granting the relief requested in the Motion.
- 3. A hearing on the Motion is scheduled to be held before the Honorable Eric L. Frank on January 8, 2019 at 9:30 a.m. in U.S. Bankruptcy Court, 900 Market Street, Courtroom #1, Philadelphia, PA, 19107.
- 4. If a copy of the Motion is not enclosed, a copy of the Motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).
- 5. You may contact the Bankruptcy Clerk's office to find out whether the hearing has been canceled because no one filed an answer.

DATE: <u>December 17, 2018</u>

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vs : U.S. Bankruptcy Court

: 900 Market Street, Courtroom #1

Keith Kratzke : Philadelphia, PA, 19107

Janet Kratzke

William C. Miller

Respondents.

## **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing Notice of Motion, Response Deadline, and Hearing Date regarding Motion for Relief from Automatic Stay was served on the parties listed below via e-mail notification:

United States Trustee, Office of the U.S. Trustee, 833 Chestnut Street, Suite 500, Philadelphia, PA 19107

William C. Miller, Chapter 13 Trustee, P.O. Box 1229, Philadelphia, PA 19105

Brad J. Sadek, Attorney for Keith Kratzke and Janet Kratzke, Sadek and Cooper, 1315 Walnut Street, Suite 502, Philadelphia, PA 19107, brad@sadeklaw.com

The below listed parties were served via regular U.S. Mail, postage prepaid, on December 17, 2018:

Keith Kratzke and Janet Kratzke, 379 Pine Run Road, Doylestown, PA 18901

Pennsylvania Department of Revenue, 110 N 8th St STE 204, Philadelphia, PA 19107

Wells Fargo Bank NV NA, P.O. Box 31557, Billings, MT 59107

DATE: December 17, 2018

### /s/ Karina Velter

Karina Velter, Esquire (94781) Adam B. Hall (323867) Sarah E. Barngrover (323972) Manley Deas Kochalski LLC P.O. Box 165028

Columbus, OH 43216-5028

Telephone: 614-220-5611 Fax: 614-627-8181 Attorneys for Creditor

The case attorney for this file is Karina

Velter.

Contact email is kvelter@manleydeas.com